

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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BRIAN FLORES, STEVE WILKS and RAY :  
HORTON, as Class Representatives, on behalf of :  
themselves and all others similarly situated, :  
:  
Plaintiffs, :  
:  
v. :  
:  
THE NATIONAL FOOTBALL LEAGUE; NEW : Civil Action No.: 22-cv-00871 (VEC)  
YORK FOOTBALL GIANTS, INC. d/b/a NEW :  
YORK GIANTS; MIAMI DOLPHINS, LTD. :  
d/b/a MIAMI DOLPHINS; DENVER BRONCOS :  
FOOTBALL CLUB d/b/a DENVER BRONCOS; :  
HOUSTON NFL HOLDINGS, L.P. d/b/a :  
HOUSTON TEXANS; ARIZONA CARDINALS :  
FOOTBALL CLUB LLC d/b/a ARIZONA :  
CARDINALS; TENNESSEE TITANS :  
ENTERTAINMENT, INC. d/b/a TENNESSEE :  
TITANS and JOHN DOE TEAMS 1 through 26, :  
:  
Defendants. :  
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**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, through their undersigned counsel, Plaintiffs Brian Flores, Steve Wilks and Ray Horton will move this court, at the United States District Court, Southern District of New York, located at 40 Foley Square, New York, NY 10007 before the Honorable Valerie Caproni, to respectfully request an order pursuant to Federal Rule of Civil Procedure 60(b) and/or Local Rule for the Southern District of New York 6.3, granting reconsideration of the aspects of the Court's March 1, 2023 Opinion and Order which compelled arbitration of certain claims, and granting such other and further relief as this Court deems just and proper.

Dated: March 14, 2023  
New York, New York

Respectfully submitted,

**WIGDOR LLP**

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- and -

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